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June 4, 2020

**VIA ECF & ELECTRONIC MAIL**

Honorable Analisa Torres, U.S.D.J.  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: *Bruce Osborne & Allen Sneed v. Iowa Sports Management, Inc., et al***  
**Docket No.: 1:19-cv-09466 (AT) (RWL)**

Dear Judge Torres:

This firm represents Iowa Sports Management, Inc. and Jon Ostrowski (collectively, “Defendants”) in connection with the above-referenced matter. We write jointly with Amit Kumar, Esq., counsel for the plaintiffs Bruce Osborne and Allen Sneed (collectively, “Plaintiffs”) (Defendants and Plaintiffs collectively referred to herein as the “Parties”), pursuant to Your Honor’s Individual Rule I.C. and in response to Your Honor’s April 2, 2020 Order (Docket No. 25).

The Parties agreed to participate in the Southern District’s mediation program (Docket No. 18) following Defendants’ filing of their request for a Pre-Motion Conference with respect to Defendants’ motion to dismiss and/or compel arbitration (Docket No. 14). The Southern District’s Mediation Office subsequently assigned Robert B. Weintraub, Esq. as the mediator, and the Parties scheduled a mediation with Mr. Weintraub for March 24, 2020. However, due to the COVID-19 restrictions placed upon the Parties, their counsel, and the Court, the mediation was rescheduled with Mr. Weintraub for May 18, 2020 and subsequently rescheduled for July 15, 2020.

Due to this necessary rescheduling, the Parties respectfully request an adjournment of the Initial Conference currently scheduled for June 11, 2020, as well as the corresponding deadline to submit a joint letter and proposed Case Management Plan so that the Parties may pursue

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settlement of this matter *via* mediation. The Parties respectfully request that the Court grant the instant request by adjourning the Initial Conference to a date following the scheduled July 15, 2020 mediation. There have been two (2) previous requests for such an adjournment (Docket Nos. 21 and 24), which Your Honor granted (Docket Nos. 22 and 25).

Should Your Honor deny the Parties' instant request for an adjournment, Defendants request that the Court schedule a telephonic pre-motion conference in connection with Defendants' anticipated motion to dismiss and/or compel arbitration in lieu of requiring the Parties to submit a joint letter and proposed Case Management Plan and to appear for an Initial Conference.

Should Your Honor have any questions or require any additional information, we are available at the Court's convenience.

Respectfully submitted,

**NIXON PEABODY LLP**

/ s / *Justin A. Guilfoyle*

Justin A. Guilfoyle, Esq.

**LAW OFFICES OF WILLIAM CAFARO**

/ s / *Amit Kumar*

Amit Kumar, Esq.

GRANTED. The initial pretrial conference scheduled for June 11, 2020 is ADJOURNED to **August 5, 2020**, at **11:20 a.m.** By **July 29, 2020**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: June 4, 2020  
New York, New York

  
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**ANALISA TORRES**  
United States District Judge